

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

NO. 3:23-CR-209-N

v.

KEYSHAWN JA'MOND JEFERSON (09)

MOTION TO REVOKE PRETRIAL RELEASE CONDITIONS

The United States of America (the “government”) moves to revoke Jefferson’s pretrial release conditions for the violations specified in the **Report of Violation of Conditions of Pretrial Release**. (Dkt. 51.)

Jefferson was indicted for a felony firearm offense, and on June 5, 2023, the Court released Jefferson on pretrial conditions that he agreed to obey. (Dkt. 12.) Jefferson, however, quickly demonstrated that he will not comply with his release conditions.

(Dkt. 51.) The violations in fact occurred within one week of Jefferson’s release, and they are not trivial infractions. (*Id.* at 1.) Specifically, (1) Jefferson has failed to surrender a semi-automatic pistol that he owns—and the weapon remains unaccounted for; (2) he has been untruthful with United States Probation about the firearm and his drug use; and (3) a Probation Officer detected a strong odor of marijuana and observed drug paraphernalia and numerous firearm accessories (holsters, etc.) in Jefferson’s residence during a post-release inspection. (*Id.*)

Accordingly, the government requests that the Court revoke Jefferson’s pretrial release conditions and remand him to the custody of the United States Marshals Service

pending the disposition of his case.

Respectfully submitted,

LEIGHA SIMONTON
UNITED STATES ATTORNEY

/s/ Gary C. Tromblay

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CERTIFICATE OF SERVICE

I hereby certify that on **June 23, 2023**, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court.

/s/ Gary C. Tromblay

GARY C. TROMBLAY
Assistant United States Attorney